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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR-09-0982 PJH (LB)
)	
Plaintiff,)	STIPULATED REQUEST TO CONTINUE
)	HEARING DATE AND TO EXCLUDE
v.)	TIME UNDER THE SPEEDY TRIAL ACT
)	
RANNI K. HILLYER,)	
)	
Defendant.)	
)	
)	

The above-captioned matter is set on September 1, 2010 before the duty magistrate judge for a status hearing. The parties request that this Court continue the hearing to September 13, 2010, at 10:00 a.m. before the duty magistrate judge and that the Court exclude time under the Speedy Trial Act between September 1, 2010 and September 13, 2010.

This continuance is necessary because counsel for Ms. Hillyer is unavailable on September 1, 2010. In addition, this case involves allegations of tax evasion based upon dozens of financial transactions between 2001 and 2004. The government has provided over 60,000 pages of discovery. The defense is actively engaged in reviewing that discovery. The defense needs additional time to review the discovery. In addition, the defense needs time to perform necessary investigation and legal research. The parties agree the ends of justice served by granting the continuance outweigh the best interests of the public and defendant in a speedy trial.

STIP. REQ. TO CONTINUE HEARING DATE AND TO EXCLUDE TIME
No. CR-09-0982 PJH

1 Therefore, the parties further stipulate and request that the Court exclude time between in
2 accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv)
3 for adequate preparation of counsel.
4

5 DATED: September 1, 2010
6

7 /s/ Cynthia Stier
8 CYNTHIA STIER
9 Assistant United States Attorney
Counsel for United States

/s/ Colleen Martin
COLLEEN MARTIN
Counsel for Ranni K. Hillyer

10
11 SIGNATURE ATTESTATION

12 I hereby attest that I have on file all holograph signatures for any signatures indicated by
13 a “conformed” signature (/S/) within this e-filed document.
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR-09-0982 PJH (LB)
)	
Plaintiff,)	[PROPOSED] ORDER GRANTING
)	STIPULATED REQUEST TO CONTINUE
v.)	HEARING DATE AND TO EXCLUDE
)	TIME UNDER THE SPEEDY TRIAL ACT
RANNI K. HILLYER,)	
)	
Defendant.)	
)	
)	
)	

The parties jointly requested that the hearing in this matter be continued from September 1, 2010 to September 13, 2010, at 10:00 a.m., and that time be excluded under the Speedy Trial Act between September 1, 2010 and September 13, 2010, to allow for the effective preparation of counsel, taking into account the exercise of due diligence, and continuity of defense counsel. Counsel for the defendant is unavailable on September 1, 2010. In addition, the government has produced a large amount of discovery to the defense, and the defense needs to review that discovery and conduct legal research and investigation. For these stated reasons, the Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendant in a speedy trial. Good cause appearing, and pursuant to 18 U.S.C §§ 3161(h)(7)(A) and (B)(iv) for adequate preparation of counsel,

IT IS HEREBY ORDERED that the status hearing in this matter is continued from September 1, 2010 at 10:00 a.m. to September 13, 2010, before the duty magistrate judge, and that time between September 1, 2010 and September 13, 2010 is excluded under the Speedy Trial Act to allow for the effective preparation of counsel, taking into account the exercise of due diligence, and continuity of defense counsel.

DATED: September 2, 2010


LAUREL BEELER
United States Magistrate Judge